

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

Case No. 1:18-md-2865-LAK

SKAT TAX REFUND SCHEME LITIGATION

This document relates to:

18-cv-07828; 19-cv-01785; 19-cv-01867; 19-cv-01781; 19-cv-01783; 19-cv-01866; 19-cv-01794; 19-cv-01798; 19-cv-01869; 19-cv-01922; 19-cv-01800; 19-cv-01788; 19-cv-01870; 18-cv-07827; 19-cv-01791; 19-cv-01792; 19-cv-01928; 19-cv-01926; 19-cv-01868; 18-cv-07824; 19-cv-01929; 19-cv-01803; 19-cv-01806; 19-cv-01801; 19-cv-01894; 19-cv-01808; 19-cv-01810; 19-cv-01809; 19-cv-01812; 19-cv-01896; 19-cv-01871; 19-cv-01813; 18-cv-07829; 18-cv-04434; 19-cv-01815; 19-cv-01818; 19-cv-01931; 19-cv-01918; 19-cv-01873; 21-cv-05339.

**MOTION FOR SEPARATE TRIALS**

**PLEASE TAKE NOTICE** that the undersigned attorneys for Defendant, Michael Ben-Jacob, will apply before the Honorable Lewis A. Kaplan of the Southern District of New York at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, at a time and date to be determined by the Court, for an order severing the claims against Defendant Michael Ben-Jacob and a separate trial for him pursuant to Federal Rules of Civil Procedure 42(b) and 21. In support of the motion, Defendant submits herewith a Memorandum of Law, Declaration of Elliot R. Peters and exhibits therewith, the pleadings and other documents on file in this matter, and any further argument or evidence that may be received by the Court.

Respectfully submitted,

KEKER, VAN NEST & PETERS LLP

Dated: May 10, 2024

By: /s/ Elliot R. Peters

ELLIOT R. PETERS

JULIA L. ALLEN

NIHARIKA S. SACHDEVA

633 Battery Street

San Francisco, CA 94111-1809

Telephone: 415 391 5400

Facsimile: 415 397 7188

epeters@keker.com

DEWEY PEGNO & KRAMARSKY

Thomas E.L. Dewey

Sean K. Mullen

777 Third Avenue, 37th Floor

New York, NY 10017

Telephone: (212) 943-9000

Facsimile: (212) 943-4325

tdewey@dpklaw.com

Attorneys for Defendant Michael Ben-Jacob